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8 UNITED STATES DISTRICT COURT

9 DISTRICT OF NEVADA

10 MICAH D. KALENOWSKI ,

11 Plaintiff,

12 vs.

13 CITY OF LAS VEGAS, NEVADA, et al.

14 Defendants.

Case No.: 2:20-cv-01743-GMN-VCF

**STIPULATION TO EXTEND TIME TO  
FILE A REPLY IN SUPPORT OF THE  
MOTIONS FOR SUMMARY JUDGMENT  
[ECF Nos. 103, 104, 105, 106]  
Second Request**

15 Defendants Las Vegas Metropolitan Police Department, Brian Fortner, Jordan Miller, and  
16 Marcus Martin (collectively, “LVMPD Defendants”), through their counsel, Kaempfer Crowell,  
17 and Plaintiff Micah D. Kalenowski, through his counsel, McAvoy Amaya & Revero, stipulate  
18 and agree to extend the current deadline of November 8, 2023, for LVMPD Defendants to file a  
19 Reply in support of their Motions for Summary Judgment, (ECF Nos. 103, 104, 105, 106), by  
20 nine days, which will create a new deadline of **November 17, 2023**.

21 1. On September 13, 2023, LVMPD Defendants filed their Motions for Summary  
22 Judgment, (ECF Nos. 103, 104, 105, 106).

23 2. The parties entered into a Stipulation to extend Plaintiff’s Response deadlines and  
24 ensuing Reply deadlines, (ECF No. 110), which the Court granted on September 28, 2023, (ECF

No. 113), making new deadlines for Responses of October 18, 2023, and for Replies of November 8, 2023.

3. Plaintiff timely filed Responses by the October 18, 2023, deadline.

4. Federal Rule of Civil Procedure 6(b) and Local Rule IA 6-1 impose a good cause standard to extend the deadline file Replies. “‘Good cause’ is a non-rigorous standard that has been construed broadly across procedural and statutory contexts.” *Ahanchian v. Xenon Pictures, Inc.*, 624 F.3d 1253, 1259 (9th Cir. 2010).

5. Good cause exists to extend the deadline for LVMPD Defendants to file their Replies by nine days in light of LVMPD Defendants’ counsel briefly being ill and a recently demanding litigation schedule in other matters.

6. An extension of time will ensure that the Court has appropriate briefing before making a ruling. Neither party will suffer prejudice from an extension of time.

DATED this 6<sup>th</sup> day of November, 2023.

KAEMPFER CROWELL

McAVOY AMAYA & REVERO

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**IT IS SO ORDERED.**

DATED this 7 day of November, 2023.

  
UNITED STATES DISTRICT COURT JUDGE